

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

HONEYWELL INTERNATIONAL INC. and )  
HONEYWELL INTELLECTUAL PROPERTIES INC., )  
  )  
  )  
Plaintiffs,                                 )  
  )  
  )  
v.    ) C.A. No. 04-1338-KAJ  
  )  
  )  
APPLE COMPUTER INC., et al,                 )  
  )  
  )  
Defendants.                                    )

**DECLARATION OF HSING-HUNG SHEN  
IN SUPPORT OF ARIMA DISPLAY CORP.'S MOTION TO DISMISS  
FOR LACK OF PERSONAL JURISDICTION**

I, Hsing-Hung Shen, declare as follows:

1. I am currently employed by Arima Display Corporation ("Arima Display") as the Special Assistant to the President. I have been employed by Arima Display since August 2000.
2. Arima Display was established in June 2000. Arima Display is a subsidiary of Arima Computer Corporation. Arima Display and Arima Computer Corporation are Taiwanese corporations. Arima Display has headquarters located in Kaohsiung, Taiwan, and facilities located in Wujiang, China and Shizuoka, Japan. Arima Computer Corporation has headquarters located in Taipei, Taiwan.
3. Arima Display manufactures color liquid crystal display panels and modules ("LCDs") at its facilities in Asia.
4. All of Arima Display's employees reside outside the United States, and none of those employees have traveled to Delaware on behalf of Arima Display.
5. Arima Display does not manufacture any goods in Delaware.
6. Arima Display does not solicit business in Delaware either directly or through an agent or distributor.
7. Arima Display does not sell or trade any goods or services in Delaware.
8. Arima Display has not contracted to supply services or goods in Delaware.
9. Arima Display does not have an interest in, use or possess any real property in Delaware.

10. Arima Display has not contracted to insure or act as surety for any person, property, or agreement relating to Delaware.
11. Arima Display does not maintain any offices or any other facilities in Delaware.
12. Arima Display is not registered to do business in Delaware and has never paid any taxes in Delaware.
13. Arima Display does not maintain any bank accounts in Delaware.
14. Arima Display does not have a telephone listing in Delaware.
15. Arima Display has never commenced any legal action in Delaware or been named as defendant in any action in Delaware with the exception of the current litigation.
16. Arima Display does not have any authorized distributors of its products in Delaware or elsewhere in the United States.
17. Arima Display has an Internet website. The website does not provide a channel for obtaining technical support. Arima Display's products cannot be ordered online using the website.
18. Arima Display has a small number of customers located in the United States. None of these customers are located in Delaware. Arima Display delivers and passes title to its products to these customers in Taiwan.
19. Arima Display has several customers located throughout Asia, including Taiwan, Hong Kong, China, Singapore and Japan. Arima Display delivers LCDs to all of its Asian customers in Taiwan or in another country in Asia. Title to the LCDs passes to Arima Display's Asian customers in either Taiwan or another country in Asia.
20. One of Arima Display's Asian customers is Arima Communications Corporation. Arima Communications is a subsidiary of Arima Computer Corporation, and is a Taiwanese corporation with headquarters in Taipei, Taiwan.
21. Arima Display does not control the manner in which its customers use the LCDs or its customers' further distribution of the LCDs.
22. Arima Display derives its LCD revenues based on Arima Display's direct sales of the LCDs to its customers. Arima Display's LCD revenues are not based on its customers' sales of end products which incorporate the LCDs.
23. Arima Display has not authorized any of its customers to use any trademark, tradename or logo of Arima Display in conjunction with any of Arima Display's customers' products which incorporate Arima Display's LCDs.
24. Arima Display does not specifically design its LCDs for the Delaware market.

25. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 23, 2006



Hsing-Hung Shen  
Special Assistant to the President, Arima Display

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 23, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing to the following, and the document is available for viewing and downloading from CM/ECF:

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\_\_\_\_\_  
William J. Wade (#704)

Dated: March 23, 2006